

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
Civil Action No. 3:17-cv-00727-RJC-DCK**

LA MICOACANA NATURAL, LLC,

Plaintiff,

v.

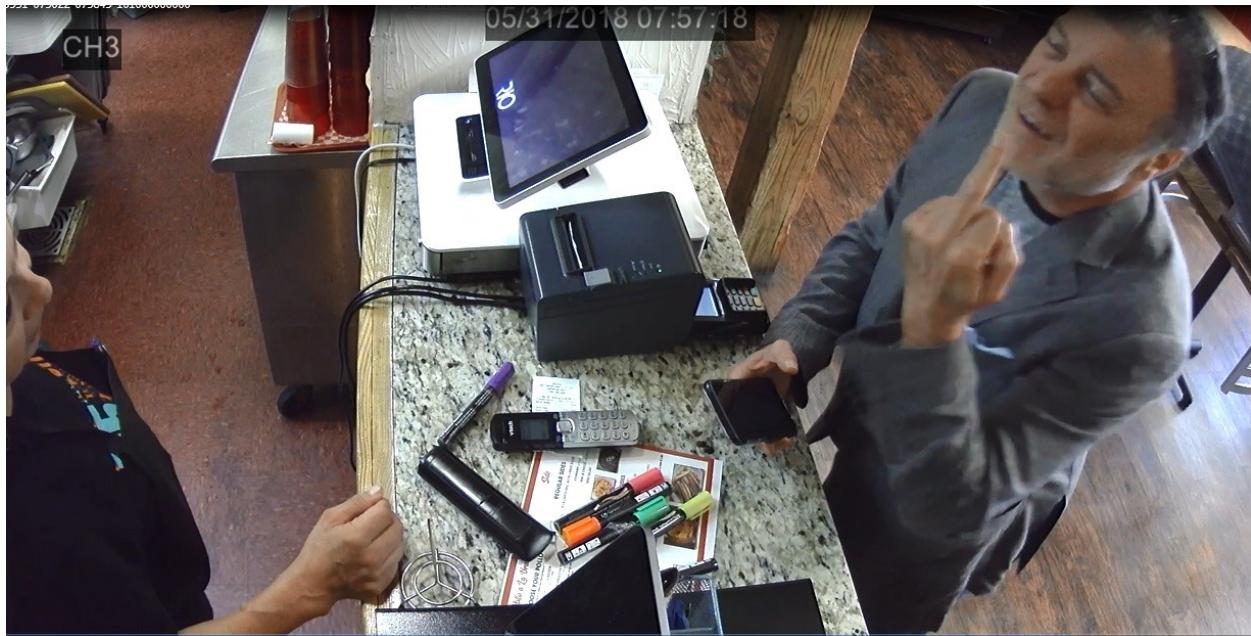
LUIS MAESTRE, an individual, d/b/a LA MICOACANA and/or LA LINDA MICOACANA et al.,

Defendants.

DECLARATION OF LAURA L. CHAPMAN

I, Laura L. Chapman, declare as follows:

1. I am an attorney licensed to practice by the State of California and admitted *pro hac vice* to this Court.
2. I know the lead Plaintiff's counsel in this action, Stephen L. Anderson. I have seen him in person many times, for extended periods of time on each occasion, in connection with working on a prior case in which he was the opposing counsel. Mr. Anderson is the person in the photograph below.



3. It is my understanding, based on the Declarations of Rebecca Vada Garcia and Telma Mendoza filed contemporaneously herewith, that the image above documents Mr. Anderson interacting with one of her employees on the morning of May 31, 2018, just before the first hearing on the preliminary injunction motion in this case. I have seen Mr. Anderson act in an angry and menacing manner, consistent with the behavior depicted in this photograph, on a number of occasions.

4. Mr. Anderson and I were in trial in the U.S. District Court for the District of Columbia in 2015 for approximately three weeks in a case entitled *Paleteria La Michoacana, Inc. v. Productos Lacteos Tocumbo S.A. DE C.V.*, 188 F. Supp. 3d 22 (D.D.C. 2016) (findings of fact and conclusions of law after bench trial) (the “PLM Case”). In the PLM Case, I represented the plaintiff, Paleteria La Michoacana, Inc. and Mr. Anderson represented the defendant, Productos Lacteos Tocumbo S.A. DE C.V. (“Prolacto”). That case involved trademark infringement; in fact, the same trademarks at issue in that case are at issue in this case.

5. In my interactions with Mr. Anderson in the PLM Case, he was recorded on video cameras in the U.S. District Court for the District of Columbia physically charging at me and two other professionals, both in the courtroom after the judge left the bench for the lunch break, and in the court cafeteria. The District Court judge presiding over the case, Honorable Rudolph Contreras, reviewed these videos *in camera* and entered a restraining order against Mr. Anderson on September 16, 2015, telling Mr. Anderson on the record:

[Y]ou don't have your emotions under control. You are way too close to this case. It is about your client, it is not about you. And you have to control your emotions. And you cannot get, I'm ordering this, within 20 feet of their counsel. If something has to be communicated to them, Mr. War [Mr. Anderson's co-counsel] must do it.

(Sept. 16, 2015 Trial Transcript at 12:16-21). A true and correct copy of the quoted portion of the trial transcript from the PLM Case is attached hereto as Exhibit 1.

6. The District Court Judge in the PLM Case also noted that Mr. Anderson misrepresents facts and creates an "alternative universe." (Sept. 25, 2015 Trial Transcript at 13:21-14:2)). A true and correct copy of the relevant excerpt from the trial transcript is attached hereto as Exhibit 2.

7. A true and correct copy of the Transcript of Motions Hearing Before the Honorable Robert J. Conrad, Jr. United States District Court Judge dated May 31, 2019 that I received from Laura Andersen, RMR, Official Court Reporter, is attached hereto as Exhibit 3.

8. Attached as Exhibit 4 are notes we received from the Concord, North Carolina Police Department detailing the call that was made on May 31, 2018 to report Stephen Anderson's behavior at the Mochia Chicken Restaurant described in the declaration of Declaration of Telma Mendoza filed contemporaneously herewith.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in San Francisco, California on this 21st day of November, 2019.



LAURA L. CHAPMAN

SMRH:4839-4134-0323.1

CERTIFICATE OF SERVICE

I certify that on November 21, 2019, I served the foregoing DECLARATION OF LAURA L. CHAPMAN on all parties of record as follows:

Via Electronic Filing

Stephen L. Anderson (attorneys@brandxperts.com)

Albert P. Allan (alallan@allaniplitigation.com)

Counsel for Plaintiff

s/ Laura L. Chapman

Laura L. Chapman